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Attorneys for Plaintiff
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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANDRA DIAZ,

Defendant.

CASE NO. 1:20-CR-00174-DAD-BAM

STIPULATION TO SET CHANGE OF PLEA
HEARING; ORDER

DATE: March 14, 2022
TIME: 9:00 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

1. The government, by and through United States Attorney Phillip A. Talbert and Assistant United States Attorney Katherine E. Schuh, and the defendant Sandra Diaz, by and through her counsel of record, Michael McKneely, hereby stipulate as follows.

2. The parties have reached a plea agreement in this case.

3. The parties ask that the matter as to defendant Sandra Diaz be set for a change of plea before the Honorable Dale A. Drozd on March 14, 2022 at 10:00 AM.

4. The parties further believe that time should be excluded to allow the defendant to prepare to enter change of plea. Failure to grant the request would unreasonably deny both the defendants and the government the reasonable time necessary for effective preparation, taking into account the parties' due diligence in prosecuting this case. 18 U.S.C. Section 3161(h)(7)(B)(iv). Based on the above-stated findings, the ends of justice served by the schedule as requested outweigh the interest of the public and

the defendant in a trial within the original date prescribed by the Speedy Trial Act. Therefore, the parties request that the Court exclude the time until the new status conference date from calculations under the Speedy Trial Act.

IT IS SO STIPULATED.

Dated: February 14, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ Katherine E. Schuh
KATHERINE E. SCHUH
Assistant United States Attorney

Dated: February 14, 2022

/s/ Michael McKneely
MICHAEL MCKNEELY
Counsel for Defendant
Sandra Diaz

ORDER

IT IS SO ORDERED.

Dated: **February 14, 2022**


UNITED STATES DISTRICT JUDGE